

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JENA HECKER,	)	
	)	
on behalf of herself and others	)	
similarly situated,	)	
	)	
Plaintiffs,	)	Case No. 1:21-cv-0349
	)	
v.	)	
	)	
EASY HEALTHCARE CORPORATION	)	
	)	
Defendant.	)	

**PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL  
OF STIPULATION OF SETTLEMENT AGREEMENT AND RELEASE**

Plaintiff Jena Hecker (“Plaintiff”), with the consent of Defendant Easy Healthcare Corporation (“Defendant”), respectfully moves this Court under Rule 23(e) for preliminary approval of the parties’ class action settlement. The settlement, which followed more than two years of contested litigation, resolves the claims of Settlement Class Members brought for breach of contract, fraud, and under the Illinois Consumer Fraud & Deceptive Business Practices Act, 815 ILCS § 505/1, *et seq.* (hereafter “ICFA”).

To that end, Defendant will create a pay-as-you-go structured settlement fund to be capped at \$750,000. From this fund, all eligible participating Settlement Class Members will receive a pro rata share not to exceed thirty dollars (\$30) each. Plaintiff now seeks this Court’s preliminary approval of the parties’ class settlement; Plaintiff’s requested incentive award; Plaintiff’s counsel’s requested attorneys’ fees and costs; Plaintiff’s appointment as class representative; and Plaintiff’s counsel’s appointment as class counsel for the following Settlement Class:

All persons located in the United States who have registered to use EHC's Premom application onto their smart phones, tablets, or laptop computers with the Android or iOS operating software systems.

As explained in the accompanying memorandum of law, Plaintiff's and the Settlement Class Members' claims are eminently suitable to class treatment, particularly in the context of the settlement presented. Furthermore, the resolution reached is fair and reasonable and should be preliminarily approved such that the parties may move forward with their proposed class notice program. Submitted herewith is a proposed order of preliminary approval, attached to Exhibit B (Settlement Agreement) and emailed to the Court in Word format. Defendant does not oppose the relief sought.

WHEREFORE, Plaintiff respectfully requests that this Court enter the accompanying order certifying the Settlement Class for settlement purposes; preliminarily approving the Settlement as fair, reasonable, and adequate; appointing Plaintiff as the class representative and Plaintiff's counsel as class counsel; preliminarily approving class counsel's fee and costs request as fair and reasonable; preliminarily approving Plaintiff's service award as fair and reasonable; approving and directing notice to Settlement Class Members in the form provided in the parties' Settlement Agreement; and setting a final fairness hearing.

Respectfully submitted,



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Plaintiff's Local Counsel for Service under  
LR 83.15

Certificate of Service

I hereby certify that a copy of the above and foregoing was sent on May 16, 2023 via the Court's CM/ECF system to all counsel of record entered on this matter.

/s/ Daniel W. Craig  
Attorney for Plaintiff